

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

WAPP TECH LIMITED PARTNERSHIP
and WAPP TECH CORP.,

Plaintiffs,

v.

BANK OF AMERICA CORP.,

Defendant.

C.A. No. 4:18-cv-00519-ALM

JURY TRIAL DEMANDED

WAPP TECH LIMITED PARTNERSHIP
and WAPP TECH CORP.,

Plaintiffs,

v.

WELLS FARGO & CO.

Defendant.

Case No. 4:18-CV-00501-ALM

JURY TRIAL DEMANDED

WAPP TECH LIMITED PARTNERSHIP
and WAPP TECH CORP.,

Plaintiffs,

v.

SEATTLE SPINCO, INC. ET AL.,

Defendants.

Case No. 4:18-CV-00469-ALM

JURY TRIAL DEMANDED

**DECLARATION OF SRIKANT CHERUVU IN SUPPORT OF
PLAINTIFFS WAPP TECH LIMITED PARTNERSHIP AND WAPP TECH CORP.'S
OPENING CLAIM CONSTRUCTION BRIEF**

Dated: March 16, 2020

I, Srikant Cheruvu, declare as follows:

1. I am an Associate at Devlin Law Firm LLC and am currently in good standing and licensed to practice in New York.

2. I am counsel for Plaintiffs Wapp Tech Limited Partnership and Wapp Tech Corp. in the above-entitled actions. I have personal knowledge of the matters set forth herein and if called, I could competently testify thereto.

3. I make this declaration in support of Plaintiffs Wapp Tech Limited Partnership and Wapp Tech Corp. (“Wapp” or “Plaintiff”)’s Opening Claim Construction Brief.

4. Attached as Exhibit 1 and herein incorporated by reference is a true and correct copy of U.S. Pat. No. 8,924,192.

5. Attached as Exhibit 2 and herein incorporated by reference is a true and correct copy of U.S. Pat. No. 9,298,864.

6. Attached as Exhibit 3 and herein incorporated by reference is a true and correct copy of U.S. Pat. No. 9,971,678.

7. Attached as Exhibit 4 and herein incorporated by reference are true and correct copies of relevant pages from the Modern Dictionary of Electronics, 7th Ed. (1999), Merriam-Webster’s Collegiate Dictionary, 11th Ed. (2004), and Microsoft Computer Dictionary, 4th Ed. (1999).

8. Attached as Exhibit 5 and herein incorporated by reference is a true and correct copy of the Declaration of Matthew B. Shoemake, Ph.D. (“Shoemake Decl.”), with Exhibits A-G to the Shoemake Decl.

9. Attached as Exhibit 6 and herein incorporated by reference is a true and correct copy of the February 27, 2020 Deposition Transcript of Matthew B. Shoemake, Ph.D. (“Shoemake Dep. Tr.”).

10. Attached as Exhibit 7 and herein incorporated by reference is a table of selected definitions of the words “emulate” and “simulate” from the dictionaries in Exhibits C-G to the Shoemake Decl.

11. Attached as Exhibit 8 and herein incorporated by reference are true and correct copies of the definitions of the words “emulate,” “simulate,” “mimic,” and “imitate” from the MacBook Pro Dictionary, Roget’s Thesaurus, and Thesaurus.com.

I declare under penalty of perjury under the laws of the United States that to the best of my knowledge and recollection the foregoing is true and correct.

Executed this 16th day of March, 2020.

/s/ Srikant Cheruvu

Srikant Cheruvu